

Revised Soil and Cap Management Plan Operable Unit 4 Swan Island Upland Facility Portland, Oregon

Prepared for: Port of Portland

December 15, 2014 1115-11



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1.0 Introduction

This Soil and Cap Management Plan (SCMP) has been prepared for use at Operable Unit 4 (OU4) at the Swan Island Upland Facility (SIUF) in Portland, Oregon (the Site). Figures 1 and 2 show the location of OU4. The risk assessment, feasibility study (FS), and source control evaluation (SCE) report (Ash Creek, 2012) completed for the Site identified two areas of soil with concentrations of chemicals above occupational site use screening levels. One area also exceeded construction worker screening levels. In the FS, the recommended remedial action to address baseline risk to occupational workers is capping of these two areas. This SCMP was prepared as a complement to the cap to address baseline risk to construction workers and to assist in decision making and appropriate soil management during operations at the Site.

1.1 Purpose and Use

The purpose of this SCMP is to summarize procedures for cap inspection, cap maintenance, and appropriate management of soil at the Site that may contain chemicals of concern (COCs) at concentrations above human-health-based screening levels for occupational and/or construction worker site use. The two areas at which COCs may be encountered above the relevant screening levels are shown on Figure 3 and are referred to herein as the Soil Management Areas. Table 1 provides a description of each Soil Management Area.

The SCMP provides:

- Identification of Soil Management Areas requiring appropriate handling of soil (see Figure 3 and Table 1);
- Cap inspection scope, inspection schedule, and maintenance;
- Information needed to properly handle the soil within the identified Soil Management Areas during future activities (including redevelopment); and
- Information needed to make informed decisions regarding health and safety of Site workers.

This SCMP is intended to provide instruction regarding certain activity restrictions and soil handling requirements in identified Soil Management Areas at the Site. Section 2 provides a brief description of the Site and a summary of the current environmental conditions. Section 3 discusses the hazard communication plan, and Section 4 presents the specific soil and cap management components for the Site.

1.2 Limitations

The scope of this SCMP is intended to address the identification and proper handling of soil defined by the Site risk assessment that does or may contain COCs above human-health-based screening levels. The

SCMP is not intended to provide health and safety recommendations for the protection of Site workers or construction personnel. Persons involved in construction activities or Site operations that could result in exposure to Site soil should be familiar with the content of this SCMP, but should have a Health and Safety Plan (HSP) prepared specific to their work.

1.3 Regulatory Framework

The following describes the regulatory framework for remedial action at the Site.

- The Port entered into a Voluntary Cleanup Program Agreement for Remedial Investigation, Source Control Measures, and Feasibility Study (Voluntary Agreement) of the SIUF with the Oregon Department of Environmental Quality (DEQ) on July 24, 2006.
- The SIUF Upland Facility is divided into five operable units. Until 2008, OU4 was part of OU2, but
 was designated a separate OU to facilitate the sale of the Site from the Port to Shipyard
 Commerce Center LLC.
- As part of the OU4 sale agreement, the Port is obligated to obtain a determination of no further action from the DEQ. At that time, responsibility for future activities, including implementation of this SCMP, transfers to the property owner, Shipyard Commerce Center LLC.
- A risk assessment, FS, and SCE were completed by the Port and a report of the results was submitted to the DEQ in April 2012 (Ash Creek, 2012).

2.0 Background

2.1 Site Location and Description

Figure 2 shows the layout of OU4. The property covers approximately 7.8 acres on the south side of Swan Island, south of N Channel Avenue. The bulk of the property consists of a paved parking lot with landscaped islands. None of OU4 is adjacent to the bank of the Willamette River. OU4 is relatively flat with land surface elevations generally ranging between 30 and 34 feet (NGVD 29 with the 1947 adjustment).

2.2 Geology and Hydrogeology

Geology. Investigations performed at the SIUF (Ash Creek, 2007; Bridgewater Group, 2000, 2001, 2002, 2008) characterized geologic conditions to approximately 40 feet below the ground surface (bgs). The soils beneath the SIUF are mixtures of silt, sandy silt, silty sand, sand, and sand with gravel. In general, sand and occasional gravel are encountered to a depth of approximately 20 feet bgs. These materials represent Willamette River dredged materials that were placed on Swan Island when it was reconfigured and raised in elevation in the 1920s. Underlying the fill is recent alluvium associated with the original Swan Island, consisting of variable mixtures of silt, sandy silt, silty sand, and sand.

Hydrogeology. Shallow groundwater occurs under water table conditions at the SIUF. The depth to groundwater ranges from approximately 18 to 30 feet bgs. Shallow groundwater is recharged by the infiltration of precipitation that falls on Swan Island. Shallow groundwater beneath OU4 discharges to the Willamette River.

Groundwater elevation near the shoreline of the Willamette River fluctuates in response to diurnal tidal cycles and seasonal changes in Willamette River elevations. Groundwater monitoring performed for the SIUF remedial investigation found that groundwater elevations in wells installed near the shoreline fluctuated approximately 8 feet. Inland, toward the middle of Swan Island, the response to changes in river elevations is less pronounced, with observed fluctuations of less than 1 foot.

2.3 Environmental Conditions

The risk assessment/FS/SCE report (Ash Creek, 2012) completed for the Site identified two areas with COCs present above human health based risk screening levels. Figure 3 shows the locations of these two areas along with the latitude and longitude coordinates. The data collected at the Site is compiled in Appendix A. Sample locations are shown on Figure A-1 in Appendix A. Soil Management Area 1 covers an area of approximately 110,000 square feet. It contains benzo(a)pyrene above occupational and, in a more limited area, construction worker risk-based concentrations (RBCs). The depth of soil containing benzo(a)pyrene above RBCs varies from primarily surface soil (0.8 to 3 feet bgs) to as much as approximately 20 feet bgs. Soil Management Area 2 is represented by a single near-surface soil sample containing arsenic above the occupational RBC. The estimated area is up to 5,000 square feet, and the depth range is 0.8 to 3 feet bgs.

2.4 Existing Cap

OU4, including the Soil Management Areas, is covered with an active asphalt concrete paved parking lot. The cap section is typically 4 inches of asphalt concrete overlying 5 inches of crushed rock base, but the section varies from 3 inches on 9 inches to 5 inches on 11 inches (asphalt concrete overlying crushed rock base).

3.0 Hazard Communication Plan

The existence of the cap and this management plan shall be identified in the owner's Environmental Management System (EMS). The EMS notice shall require review and implementation of this plan as discussed below.

Excavation of soil within the soil management areas or any work with the potential to penetrate the cap will only occur after the contractor or entity conducting such excavation or activities has met with the current owner, reviewed this SCMP, and incorporated appropriate information from this SMCP into the contractor's health and safety plan. The health and safety plan will provide worker protection procedures and equipment appropriate for the nature of the work and the site conditions, and will include using qualified personnel who are trained and meet the standards under the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) 29 Code of Federal Regulations 1910.1209.

The locations of the areas subject to this plan are shown on Figure 3, including a table of coordinates defining the areas. In addition, hazard notice signage shall be posted and maintained at the entrances to the parking area constituting the cap. Appendix B provides a template for the hazard notice sign.

4.0 Contaminated Soil Management

The SCMP was prepared to support management of soil in the Soil Management Areas identified on Figure 3. This will consist of the following elements:

- Cap inspection and maintenance;
- Management of soil, when soil within the Soil Management Area is accessed; and
- Additional health and safety considerations.

4.1 Cap Inspection and Maintenance

The purpose of the cap is to prevent occupational worker direct contact with benzo(a)pyrene and arsenic in the shallow soil. The extent of the capped area is shown on Figure 3. As the effectiveness of the pavement cap relies on the integrity of the pavement, the property owner shall be responsible for regular inspections of the paved surface to identify cracking, spalling, or other failures that would potentially allow contact with the underlying soil. If such failures are identified, the pavement will be repaired as soon as can be practicably done. Repairs would consist of seal coat, overlayment, and/or replacement of pavement and base rock.

The property owner must immediately notify DEQ by telephone of any condition or occurrence at the Site that does not conform with the requirements of the Easement and Equitable Servitude (EES) related to the Soil Management Areas.

Inspections will be conducted annually on or before September 1 and an annual inspection report will be submitted to DEQ by October 1 of each year. An inspection template is included in Appendix C. The annual inspection report will: (a) document and confirm that the restrictions and prohibitions of the EES are being complied with and that the cap and SCMP continue to protect public health and the environment; (b) report on any actions that may have compromised the effectiveness of the cap, and the measures taken

to address these issues consistent with the EES; and (c) confirm that the cap and SCMP are working properly. The annual report shall generally conform to the following outline:

- Introduction
 - a. Purpose
 - b. Scope
- 2. Cap Inspection Summary
- 3. Soil and Cap Management Plan Review
- 4. Conclusions and Recommendations
- 5. Appendices
 - a. Completed Cap Inspection Form
 - b. Photographs

Annual reports must include sufficient detail to allow DEQ to determine compliance with the EES requirements, and include a photographic log that supports the report's narrative.

Upon acceptance by DEQ of five years of annual inspection reports, the property owner may make a written request to DEQ to reevaluate the scope and frequency of inspections (based in part on reasonable documentation of the property owner's efforts to inspect and maintain the cap). No change in the scope or frequency of the inspections or reports will be made without written approval by DEQ.

4.2 Soil Management

This section discusses soil management requirements related to potential COCs in the Site soil. Information related to upgraded health and safety considerations are discussed in Section 4.3. The upgraded health and safety requirements are in addition to requirements that may be imposed on construction projects under federal, state, or local regulations.

Applicability. The requirements of this plan shall apply to soil within the Soil Management Areas shown on Figure 3. Figure 3 includes a coordinate table defining the areas. In addition, signage at the cap location will alert users of the presence of the cap (see Appendix B). These areas correspond to soil containing COCs above applicable or relevant screening criteria. Soil within these areas shall be assumed to contain COCs unless sampling in accordance with Section 4.2.1 demonstrates that the soil is suitable for unrestricted use.

Scope. Soil management shall consist of the following steps:

1) Characterize the soil to be disturbed in accordance with Section 4.2.1.

- a) If COCs are equal to or less than the unrestricted use criteria (see Table 2¹), then no special handling is required and skip to Step 4.
- b) If COCs are present above the unrestricted use criteria, proceed to Step 2.
- 2) Handle soil in accordance with the requirements in Section 4.2.2.
- 3) For final disposition of excavated soil, follow the requirements of Section 4.2.3.
- 4) Prepare and file a report in accordance with Section 4.2.4.

4.2.1 Characterization of Soil

Soil to be disturbed by activities within the Soil Management Areas shown on Figure 3 shall be characterized for proper handling and disposition. In accordance with the SCMP, characterization may be conducted either prior to or after the soil disturbing activity.

Characterization Prior to Construction. Soil samples shall be collected at a frequency in accordance with generally accepted environmental practices at the time of the work and as approved by DEQ. A pre-approved sampling frequency is one five-point composite sample per 100 cubic yards of soil. At a minimum, soil samples shall be analyzed as follows:

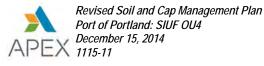
- Area 1: Polycyclic aromatic hydrocarbons (EPA Method 8270-SIM) and total petroleum hydrocarbons (method NWTPH-Dx); and
- Area 2: Arsenic (EPA Method 6010 or 6020).

If soil is to be removed from the Site and disposed of at a regulated facility, the potential disposal facility should be contacted for any other testing that may be required for acceptance for disposal.

Once characterization results are obtained, the results should be compared to the criteria listed in Table 2 (or current criteria – see Footnote 1). If the soil contains one or more COCs at concentrations above the unrestricted use criteria, Sections 4.2.2 and 4.2.3 apply. If no COCs exceed the unrestricted use criteria, this plan places no additional restrictions on the soil handling or disposition than would ordinarily apply from applicable state and federal regulations.

Characterization after Excavation. If soil is characterized after excavation, the soil shall be presumed to contain COCs until testing demonstrates otherwise. The soil shall be handled in accordance with Section 4.2.2. Stockpiles shall be sampled at a frequency and using procedures in accordance with generally accepted environmental practices at the time of the work and as approved by DEQ.

¹ Table 2 lists the criteria current at the time of this SCMP. These criteria may be periodically updated and criteria current at the time of the work should be used.



A pre-approved sampling frequency is one five-point composite sample per 100 cubic yards of soil. At a minimum, soil samples shall be analyzed as defined above. The potential disposal facility should be contacted for any other testing that may be required for acceptance for disposal.

4.2.2 Handling of Soil with COCs above Unrestricted Use Criteria

Until demonstrated otherwise (such as by the characterization described in Section 4.2.1), soil from the Soil Management Areas shown on Figure 3 shall be presumed to contain COCs above the unrestricted soil use concentrations shown in Table 2 (or current criteria – see Footnote 1) and shall be handled in accordance with the procedures in this section. The procedures in this section are in addition to any other requirements for handling soil without COCs.

Soil Excavation. Excavated soil that contains COCs above unrestricted use concentrations (see Table 2 or current criteria – see Footnote 1) shall be maintained within the limits of the excavation, stockpiled in accordance with this plan, or placed immediately into a waiting truck. During excavation, the soil should be observed for indications of contamination (e.g., stained soil, petroleum-like sheen). If observed, the soil with visible indications of contamination should be stockpiled separately from other soil and then further characterized and managed appropriately. Soil from Area 1 should not be mixed with soil from Area 2.

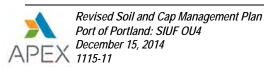
Stockpiling. Excavated soil that is not direct-loaded to trucks for removal from the Site shall be placed in a covered roll-off box or in a stockpile. Stockpiles shall be maintained at all times in a manner that prevents runon, runoff, and erosion of the stockpiles. Stockpiles shall be placed on plastic sheeting (6-mil minimum) with a berm around the perimeter of the stockpile. The berm may be constructed by laying the bottom plastic over straw bales, Jersey Barriers, ecology blocks, or by other equivalent methods. When not active, stockpiles shall be covered with plastic and secured with sand bags or equivalent. The soil shall remain in well-maintained stockpiles until final disposition. Once sampled, no soil shall be added to a stockpile.

Loading and Hauling. Excavated soil may be loaded into trucks for hauling to a disposal facility or a temporary stockpile. During loading, care shall be taken to minimize spillage of soil on the exterior of the trucks or clean ground surface. Any soil on the truck exterior shall be removed prior to leaving the loading area. The trucks shall be covered with a tarp prior to departing the Site. Trucks shall not be allowed to leave the Site if liquids are draining from the load. Excavated soil shall be transported in accordance with applicable U.S. Department of Transportation hazardous materials transportation regulations.

4.2.3 Final Disposition of Soil

The results of the characterization testing (Section 4.2.1) shall be used to determine the final disposition of excavated soil, as follows (screening criteria are listed in Table 2, but use updated criteria if available):

If COC concentrations are less than unrestricted use criteria, this plan places no restrictions on the
use of the soil.



- If COC concentrations are less than the DEQ Clean Fill Screening Levels, but at least one COC exceeds the unrestricted use criteria, this plan places no restrictions on the use of the soil provided such use is outside of the Portland Harbor upland source control area.
- If COC concentrations are less than Occupational Screening Levels, but at least one COC exceeds the unrestricted use criteria, than the soil may be re-used at the Site within the Soil Management Area from where it originated provided that this use does not pose a risk of sediment contamination to the Willamette River (e.g., erosion to the river), adversely impact groundwater, or result in storm water concentrations that exceed applicable standards (e.g., it cannot be placed in erosional areas near unprotected storm water inlets).
- If at least one COC concentration exceeds Occupational Screening Levels, then the soil shall be properly designated and disposed of at a licensed disposal facility or placed beneath an appropriately engineered cap on the Site within the Soil Management Area.

4.2.4 Reporting

A brief report shall be prepared for the file presenting the results of sampling, chemical analysis, and soil disposition. At a minimum, the report will include:

- A site plan showing soil sample locations;
- Summary tables of analytical results;
- Discussion of field observations and results;
- Documentation of quantities and final disposition of soil, including a site plan if soil is left at the Site;
- Copies of soil disposal receipts, if applicable; and
- Analytical laboratory reports.

Each report should reference the DEQ Environmental Cleanup Site Information (ECSI) number for the Site: ECSI No. 271. The report shall be maintained with this SCMP as an addendum in an appropriate file.

4.3 Health and Safety Training and Planning

This section addresses health and safety training in addition to that which is normally conducted for construction activities. Any party completing any activity within the Soil Management Areas at the Site as defined on Figure 3 must comply with the following requirements.

Training. Employees engaged in activities that include exposure to media containing COCs above applicable risk-based health levels must be trained in accordance with 29 CFR 1910.120. Training will not be required for work areas where environmental conditions have been characterized (prior to the work

activities) and shown not to contain COCs at concentrations above the unrestricted use criteria, or where a risk analysis demonstrates that the COCs will not pose an unacceptable risk to the Site workers.

Health and Safety Plan. The party in charge of the Site activity shall prepare and implement an HSP in accordance with Occupational Safety and Health Administration (OSHA) requirements (i.e., 29 CFR 1910.120) and Oregon Administrative Rules. The HSP shall be prepared by a Certified Industrial Hygienist or qualified safety professional with a minimum of 40 hours of OSHA HAZWOPER training. The HSP shall identify and address, but not be limited to, the physical and chemical hazards of the Site and the proposed activities. The HSP content shall, at a minimum, describe the following:

- Required personal protective equipment;
- Site safety supervisor;
- Action levels at which protection would be upgraded;
- Controls to be used to minimize worker exposure to hazardous substances;
- Exclusion, contamination reduction, and clean zones;
- Personnel decontamination procedures;
- Route to hospital; and
- Monitoring equipment to be employed.

Data tables from soil investigations within or near the Soil Management Areas at the Site are reproduced in Appendix A and these data provide a guideline for the magnitudes of COCs encountered in the Soil Management Areas at the Site.

5.0 References

- Ash Creek, 2007. Former Substation and Berth 305 Sampling Results Addendum, Swan Island Upland Facility, Portland, Oregon, ECSI No. 271. November 14, 2007.
- Ash Creek, 2012. Risk Assessment, Feasibility Study, and Source Control Evaluation, Operable Unit 4, Swan Island Upland Facility, Portland, Oregon. April 23, 2012.
- Bridgewater Group, 2000. Remedial Investigation/Feasibility Study Work Plan for the Portland Shipyard, Portland, Oregon. November 2000.
- Bridgewater Group, 2001. Phase IB Work Plan Addendum, Portland Shipyard Remedial Investigation. July 13, 2001.
- Bridgewater Group, 2002. Phase IB and II Soil and Groundwater Sampling Results, Portland Shipyard Remedial Investigation. June 25, 2002.
- Bridgewater Group, 2008. 2007 Annual Groundwater Monitoring Results, Swan Island Upland Facility, Remedial Investigation. March 2008.

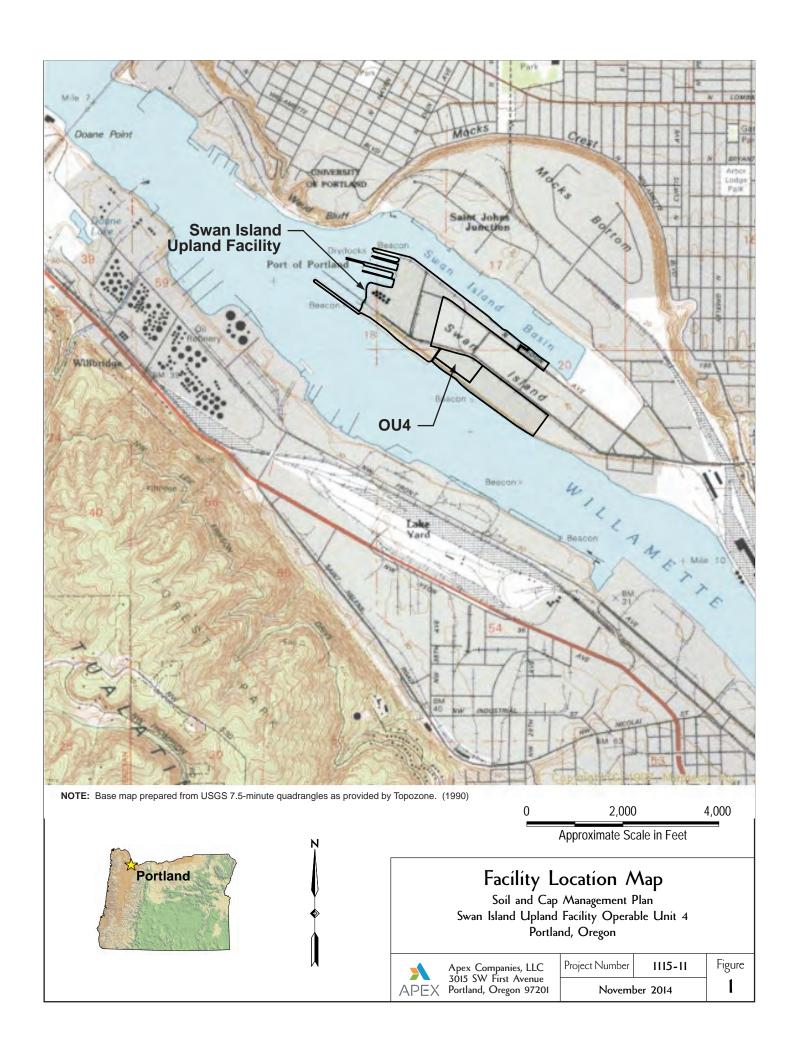
Table 1
Description of Soil Management Areas
Swan Island Upland Facility, Operable Unit 4
Portland, Oregon

Soil Management Area	Description	Lateral Extent	Vertical Extent
Area 1	Polycyclic aromatic hydrocarbons (PAHs) in soil	Area approximately 110,000 square feet. See Figure 3.	0.8 to 20 feet below surface of cap
Area 2	Arsenic in surface soil	Up to 5,000 square feet. See Figure 3.	0.8 to 3 feet below surface of cap

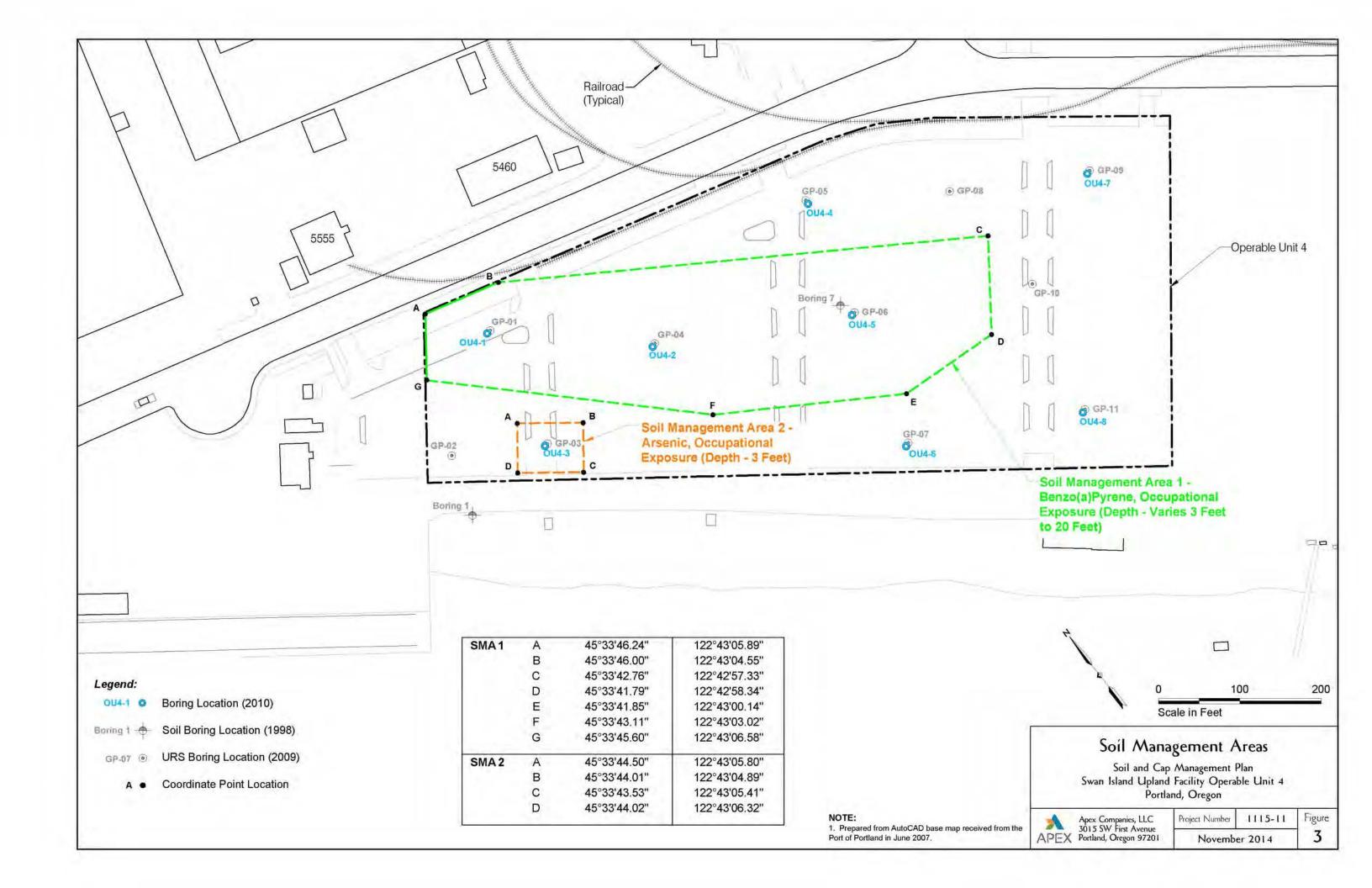
Table 2 Soil Characterization Concentration Limits Swan Island Upland Facility, Operable Unit 4 Portland, Oregon

		Soil Concentration Limits	
Compound		Oregon DEQ Clean Fill	Occupational Screening
Compound	Unrestricted Use (1)	Screening Levels (2)	Levels ⁽³⁾
	(mg/kg)	(mg/kg)	(mg/kg)
Total Petroleum Hydrocarbons			
Diesel/Heavy Oil Combined	780		14,000
Polynuclear Aromatic Hydrocarbon	s (PAHs)		
Acenaphthene	0.29	29	61,000
Anthracene	0.057	29	310,000
Benzo(a)anthracene	0.032	0.15	2.7
Benzo(a)pyrene	0.015	0.015	0.27
Benzo(b)fluoranthene	0.15	0.15	2.7
Benzo(k)fluoranthene	0.027	1.1	27
Chrysene	0.057	14	250
Dibenzo(a,h)anthracene	0.015	0.015	0.27
Fluoranthene	0.111	29	29,000
Fluorene	0.077	29	41,000
Indeno(1,2,3-cd)pyrene	0.017	0.15	2.7
Naphthalene	0.087	0.087	23
Pyrene	0.053	1,700	21,000
Metals			
Arsenic	8.8	8.8	8.8

- 1. Unrestricted Use Soil values from EPA Portland Harbon Clean Fill Requirement (Undated Draft provided by DEQ July 24, 2012) except naphthalene and arsenic from DEQ Clean Fill screening levels (see Note 2).
- 2. Clean fill screening levels from Oregon DEQ Internal Management Directive, Clean Fill Determinations (July 23, 2014).
- 3. Occupational Screening Levels from Oregon DEQ RBDM table (June 7, 2012 update) except arsenic from DEQ Clean Fill screening levels (see Note 2).
- 4. mg/kg = milligrams per kilogram.









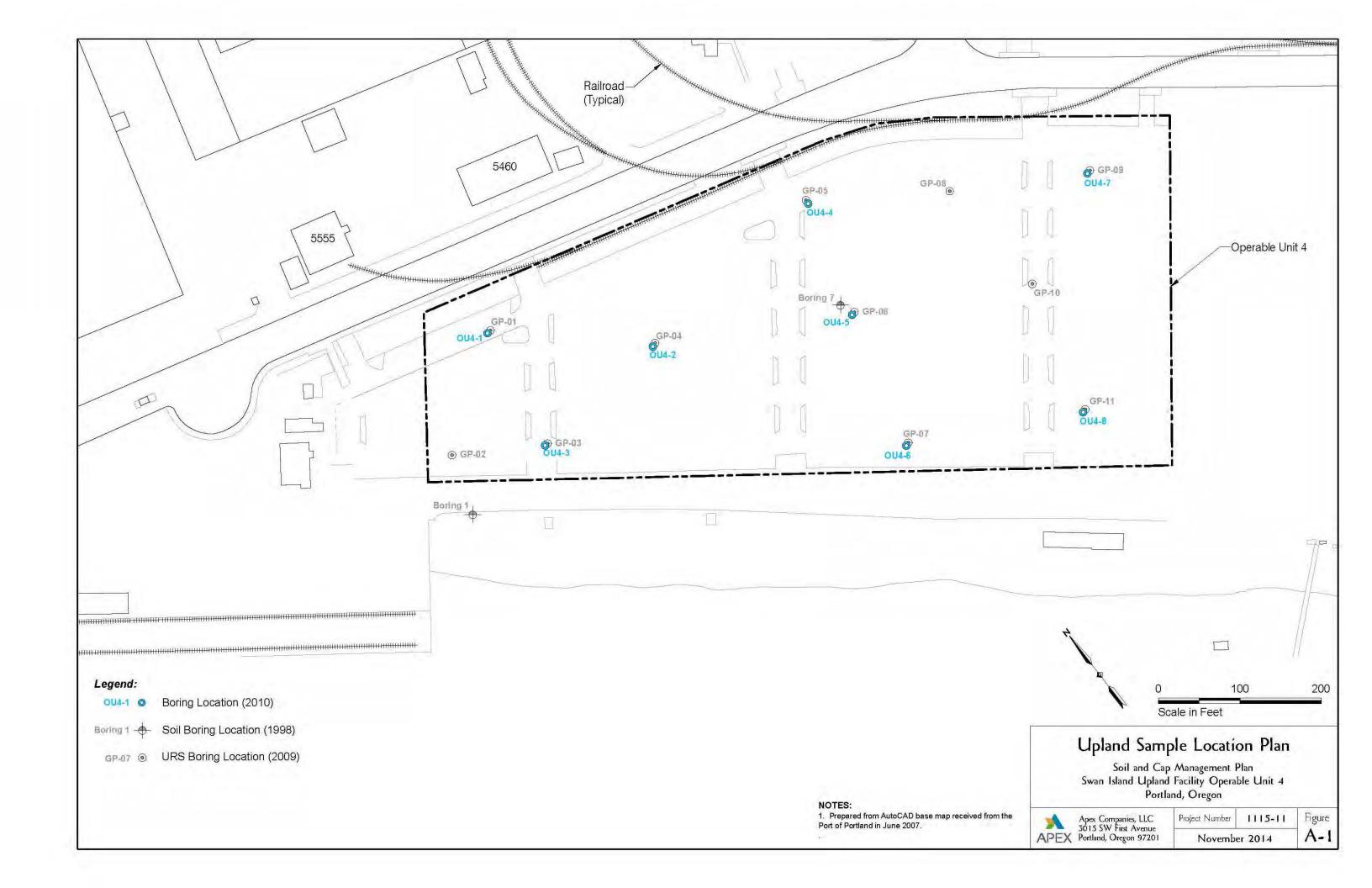


TABLE A-1 Analytical Data Results—Main Parking Lot (Detected Constituents Only)

Boring No.	Sample Interval	Detected Analyte	Detection Limit (mg/kg)*	Reporting Limit (mg/kg)*	Sample Results (mg/kg)*
1	0 to 24 inches	Arsenic	0.250	0.500	2.71
		Barium	0.0545	5.00	81.3
		Chromium	0.0470	0.500	12.5
		Lead	0.320	5.00	11.6
	16 to 18 feet	Arsenic	0.250	0.500	1.60
		Barium	0.0545	5.00	84.1
		Chromium	0.0470	0.500	10.5
7	0 to 24 inches	Arsenic	0.250	0.500	2.45
		Barium	0.0545	5.00	158
		Chromium	0.0470	0.500	13.6
		Lead	0.320	5.00	7.00
		Heavy oil range hydrocarbons	13.0 [†]	100 [†]	451 [†]
· · · · · · · · · · · · · · · · · · ·	16 to 18 feet	Arsenic	0.250	0.500	1.67
······································		Barium	0.545	5.00	76.7
		Chromium	0.0940	1.00	9.44

^{*}All weights are mg/kg dry unless noted otherwise.

†mg/kg, not reported as "dry"

Table A-2

Soil Analytical Results: TPH Swan Island Upland Facility

Portland, Oregon

Sample Number	Sub A-N-1	Sub A-E-1	Sub A-S-1	Sub A-W-1	Sub R-N-1	Sub R-E-1	Sub R-S-1	Sub R-W-1
Sampling Interval (inches)	30 - 40	34 - 46	28 - 40	22 - 34	13 - 23	14 - 28	10 - 24	14 - 25
Sample Date	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007
TPH-HCID				Concentrations	in mg/kg (ppm)			
Gasoline-Range	<22	<22	<22	<24	<27	<24	<24	<27
Diesel-Range	<54	<54	<55	<59	<68	<59	<60	<66
Residual-Range	<110	<110	<110	<120	<140	<120	<120	<140

Notes:

- 1. TPH-HCID = Hydrocarbons identification by Northwest Method NWTPH-HCID.
- 2. mg/kg = milligram per kilogram (parts per million [ppm]).
- 3. < = Not detected above the method reporting limit.
- 4. Shading = Detected concentration.
- 5. Sample ID nomenclature is per the following: substation designation-geographic orientation-sample number.

For example, Sub A-N-1 = Substation A. North corner, sample 1.

Table A-3
Soil Analytical Results: PCBs
Swan Island Upland Facility

Portland, Oregon

Sample ID:	Sub A-N-1	Sub A-E-1	Sub A-S-1	Sub A-W-1	Sub R-N-1	Sub R-E-1	Sub R-S-1	Sub R-W-1
Sampling Interval (inches)	30 - 40	34 - 46	28 - 40	22 - 34	13 - 23	14 - 28	10 - 24	14 - 25
Sample Date:	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007	5/31/2007
PCBs								
Aroclor 1016	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9
Aroclor 1221	<20	<20	<20	<20	<20	<20	<20	<20
Aroclor 1232	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9
Aroclor 1242	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9
Aroclor 1248	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9
Aroclor 1254	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9
Aroclor 1260	<9.6	<9.6	<9.9	<10	<9.7	<9.8	<9.8	<9.9

Notes:

- 1. PCBs = Polychlorinated Biphenyls by EPA Method 8082.
- 2. μg/kg = micrograms per kilogram (parts per billion [ppb]).
- 3. < = Not detected above the method reporting limit.
- 4. Shading = Detected concentration.
- 5. Sample ID nomenclature is per the following: substation designation-geographic orientation-sample number.

For example, Sub A-N-1 = Substation A, North corner, sample 1.

Table A-4. URS Soil Analytical Results

Shipyard Commerce Center Parking Lot Purchase (units = mg/kg)

				[NWTF	PH-Dx ¹					TB	Γ Compound	ds					Det	TBT Compounds Detected PAHs per EPA 8270-SIM Detected Priority Pollutant Metals									Detected	Priority Po	lutant Me	tals	
						1																										
	Location	Sample ID	Sample Depth (ft)	Date	Diesel Range	Heavy Oil Range	NWTPH-Gx Gasoline Range	VOCs	SVOCs	PCBs	Tributyltin	Dibutyltin	Butyltin	Anthracene	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene	Arsenic	Barium	Chromium	Copper	Lead	Mercury	Nickel Zinc
		GP01-05-080523	4-8	23-May-08	21.8U	43.7U	3.78U				0.0036U	0.023	0.0075	0.0521U	0.135	0.237	0.33	32 ²	0.303	0.202	0.385	0.243	0.0521U	0.0779	0.536	2.19	-	9.52	10.6	2.27	0.0857U	11.6 30
	GP-01	GP01-20-080523	18-22	23-May-08	42.4U	84.9U	6.09U				0.0037U	0.0055U	0.0039U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	3.61	-	19	20.3	3.81	0.563	22.3 55.6
		GP01-40-080523	36-40	23-May-08	29.2U	58.5U	4.82U				0.0037U	0.0055U	0.0039U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	2.65	-	12.7	14	2.23	0.113U	15.4 37.7
		GP02-5-080517	4-6	17-May-08	23.4U	46.9U	3.98U				0.0038U	0.0057U C	0.0040U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	1.71	-	12.7	11.5	1.94	0.0963U	15 38.5
	GP-02	GP02-50-080517	50-52	17-May-08	38U	75.9U	5.08U				0.0037U	0.0055U	0.0039U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	1.76	-	18.9	16.8	2.82	0.121U	21 50.1
	GP-02	GP02-75-080517	73-75	17-May-08	28.3U	56.7U	4.83U				0.0038U	0.0057U	0.0040U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	3.17	-	11.9	13.4	2.23	0.114U	17.8 40.6
		GP02-110-080517	108-110	17-May-08	35.1U	70.2U	4.86U				0.0038U	0.032	0.010	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	2.08	-	12.7	14.4	2.12	0.112U	18.8 41
		GP03-05-080523	4-8	23-May-08	35.8U	71.6U	4.94U				0.0036U	0.0054U C	0.0038U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	1.79	-	10.1	11.3	1.97	0.11U	13.1 36.8
	GP-03	GP03-20-080523	18-22	23-May-08	38.9U	77.8U	5.29U				0.0037U	0.024	0.0062	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	2.82		19.5	18.1	3.35	0.109U	20.8 49.1
		GP03-40-080523	36-40	23-May-08	35.2U	70.3U	4.93U				0.0038U	0.0057U	0.0040U		0.0379U		0.0379U			0.0379U	0.0379U		0.0379U	0.0379U	0.0379U	3.24	-	11.8	13.8		0.122U	15.2 37.5
		GP04-05-080522	4-8	22-May-08	32.8U	65.6U	4.63U	1			0.0038U	0.0058U C	0.0041U	0.0724U	0.144	0.283	0.3	_	0.255	0.231	0.471	0.227	0.0724U	0.246	0.684	3.94	-	14	14.3		0.096U	16.8 41.4
	GP-04	GP04-20-080522	18-22	22-May-08	30U	59.9U	4.61U				0.0038U	0.0072			0.0315U		0.0315U			0.0315U	0.0315U		0.0315U	0.0315U	0.0315U	2.79	-	17.7	15.2		0.106U	18.9 43.8
		GP04-40-080522	36-40	22-May-08	37.4U	74.8U	4.86U				0.0038U		0.0040U		0.0387U					0.0387U	0.0387U		0.0387U	0.0387U	0.0387U	1.82	-	17.9	15.4		0.115U	15.7 41.9
		GP05-05-080522	4-8	22-May-08	34U	67.9U	4.93U					0.0057U C			0.0443U				0.0443U	0.0443U	0.0443U		0.0443U	0.0443U	0.0443U	2.04	-	12.7	13.3		0.111U	16 39
	GP-05	GP05-20-080522	18-22	22-May-08	48.9U	97.8U	6.32U				0.0037U		0.0082		0.0873	0.0803	0.09		0.0434U	0.0984	0.187		0.0434U	0.139	0.235	2.89	-	15.1	16.6		0.141U	20.9 49
		GP05-40-080522	36-40	22-May-08	32.8U	65.6U	4.19U				0.0037U		0.0039U		0.0346U	0.0346U	0.0346U			0.0346U		0.0346U	0.0346U	0.0346U	0.0346U	1.59	-	10.1	12.1		0.0883U	12.6 32.4
		GP06-7.5-080516	5-10	16-May-08	190	536	4.72U				0.0037U		0.0080	0.938U	2.94	5.88	7.3	_	5.61	5.04	9.1	4.73	0.938U	3.56	13	2.09	-	12.7	13.4		0.0955U	16 41.4
		GP06-50-080516	47-53	16-May-08	29.8U	59.6U	4.97U		< MRLs	•		0.0057U 0			0.0381U			-	0.0381U				0.0381U		0.0381U	1.29U		14.7	14.4		0.103U	18.4 46
URS Soil Results	GP-06	GP06-75-080516	70-75	16-May-08	34.9U	69.8U	4.73U	< MRLs				0.0057U 0			0.0408U				0.0408U					0.0408U		1.58	_	13.5	12.7		0.107U	18.9 39.4
		GP06-110-080516	105-110	16-May-08	33.3U	66.6U	5.00U	1	PAHs ⁴	< MRLs		0.0057U 0			0.04000 0.0851U		0.04000 0.0851U			0.04000 0.0851U		0.0455U			0.0400U	2.15	-	12.2	14.4		0.0988U	17.5 41.7
		GP07-05-080522	4-8	22-May-08	34U	68U	4.60U				0.0036U	0.00370			0.0363U	0.0363U	0.0363U			0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	3.04	-	18	17.5			20.3 47.5
	GP-07	GP07-20-080522	18-22	22-May-08	33.9U	115	4.67U					0.0073		0.0303U	0.0303U	0.338U		0.338U	0.338U	0.0303U	0.338U	0.0303U	0.0303U	0.0303U	0.0303U	3.04	-	19.4	20.2			21.3 54.6
	ai oi	GP07-40-080522	36-40	22-May-08	35.9U	71.7U	4.80U					0.0055U 0							0.0413U							4.34	-	12.2	13.6	2.81		14.7 34.3
		GP08-05-080522	4-8	22-May-08	28.6U	57.1U	4.77U				0.0037U	0.00330			0.0413U					0.0393U	0.0393U	0.0413U	0.0413U	0.0393U	0.0393U	2.79	-	21.4	16.7			21.2 48.5
	GP-08	GP08-03-080522	18-22	22-May-08	32.2U	64.5U	4.77U	1			0.0038U		0.0040U		0.0393U		0.0393U							0.0393U		2.07	-	12.4	13.4		0.117U	14.9 39.3
	GI 00	GP08-40-080522	36-40	22-May-08	29.5U	59U	4.78U					0.0055U 0			0.0361U		0.0361U				0.0361U				0.0361U	1.74	-	12.5	14.9			15.1 39.2
		GP09-5-080518	5-8	18-May-08	24.3U	411	4.78U	1			0.0037U	0.0058U 0		0.0302U	0.00020	1.03U	0.0302U			0.0302U 0.207U	0.207U	1.03U	0.0302U 0.207U	0.0302U 0.207U	0.0302U 0.207U	2.38	-	14.1	12.8		0.110 0	15.1 43.5
		GP09-50-080518	48-50	18-May-08	30.2U	60.4U	5.02U	1			0.0039U	0.0055U C			0.0441U										0.2070 0.0441U	1.43U		11.2	13.6		0.117 0.115U	15 39.3
	GP-09	GP09-75-080518	73-75	18-May-08	31.3U	62.6U	4.77U	ł			0.0037U	0.00330							0.0441U					0.0441U		1.430	-	10.4	12.3		0.113U	14 36.1
		GP09-75-080518	108-110	18-May-08	27.6U	55.3U	4.770 4.99U	1				0.0057U 0			0.0434U 0.0325U					0.0434U 0.0325U	0.0434U 0.0325U	0.0434U 0.0325U		0.0434U 0.0325U	0.0434U 0.0325U	2.23	-	15.3	15.4		0.103U 0.104U	24.5 46
		GP10-5-080518	3-5	18-May-08	38.2U	76.4U	5.60U	1			0.0036U	0.0057U C		0.0508U	0.0508U	0.0525U	0.0525U			0.0525U	0.0509	0.0525U 0.0508U	0.0525U 0.0508U	0.0525U	0.03230	2.23	-	30.6	25.5		0.1040 0.119U	25.4 61.6
	GP-10	GP10-5-080518 GP10-18-080518	17-19	18-May-08	36.4U	76.4U 72.8U	5.30U	1				0.0054U C			0.0508U 0.0851U		0.0508U 0.0851U					0.0508U 0.0851U			0.0624 0.0851U	5.75	-	23.1	25.5		0.1190 0.195	24.2 59.8
	GF-10	GP10-18-080518 GP10-40-080518	38-40	18-May-08	36.4U 30.7U	61.4U	5.41U	1				0.0054U 0			0.0851U 0.0461U		0.0851U 0.0461U					0.0851U 0.0461U				2.56	-	22.2	20.2			24.2 59.8
		GP10-40-080518 GP11-5-080518	38-40	18-May-08	30.70 31U	62.1U	4.89U	1			0.0036U	0.0054U C		0.0451U	0.0451U					0.0451U	0.0451U	0.0461U 0.0455U	0.0451U 0.0455U	0.0451U 0.0455U	0.0461U 0.0455U	3.47	-	31.6	26.8	5.01	0.09890	26.3 61.6
	GP-11	GP11-5-080518 GP11-20-080518	18-20	18-May-08	36.6U	73.3U	4.89U 5.57U	1			0.0038U	0.0055U C		0.0455U 0.0461U	0.0455U 0.0461U		0.0455U 0.0461U					0.0455U 0.0461U	0.04550	0.04550	0.04550	4.37		35.1	51.7	28.1	1.83	27.1 88
	GF-11	GP11-20-080518 GP11-40-080518	18-20 38-40	18-May-08 18-May-08	27.1U	73.3U 54.2U	4.79U	-			0.000.0	0.0055U C			0.0461U 0.0365U								0.0498 0.0365U		0.0777 0.0365U	2.07	-	23.5	20.5		0.0959U	21 50.8
DEO Default Book	around Co	oncentrations for Meta		10-IVIAY-U8	- 27.10	54.20	4.790	1		+	0.00360	0.00540	J.0036U	0.03650	0.03030	U.U303U	บ.บงชอบ	U.U303U	บ.บงชอบ	0.03650	0.03030	0.03030	0.03630	0.0365U	0.03650	7	-	23.5 42	36	2 .96	0.09590	38 86
	9		-		-	 	<u> </u>	-	 -	0.00039		-		0.845	1.05	1.45	-	13	0.3	1.29	2.23	0.1	0.561	1.17	1.52	7	-	111	149	17	0.07	48.6 459
J303 Table 3-1: C	Jpiana 501	I / Stormwater Sedim	ierit		-	-	-	-	_	0.00039	0.0023	-	-	0.043	1.00	1.40	-	ıs	0.5	1.29	2.23	U.I	1 00.0	1.17	1.52	1	-	111	149	17	0.07	40.0 459

mg/kg: milligrams per kilogram VOCs : volatile organic compounds per EPA 8260B SVOCs : semi volatile organic compounds per EPA 8270C PCBs: polychlorinated biphenyls by EPA 8082

TBT: Tributyl Tins by EPA 8270D-Selected Ion Monitoring (SIM)
PAHs: polyaromatic hydrocarbons per EPA 8270-Selected Ion Monitoring (SIM)
Total Metals per EPA 6020

U: less than the MRL

- : Data not analyzed or not applicable

- Bold font = indicates detected concentrations above the MRL
 Shaded values indicates an exceedance of the screening level value (SLV).

 1: TPH-Dx = Diesel and oil-range total petroleum hydrocarbons (TPH) by Northwest Method NWTPH-Dx.
- 2: Peak separation for Benzo(b) and Benzo(k)fluoranthenes does not meet method specified criteria. Reported result includes the combined area of the two isomers and should be considered the total of Benzo(b+k)Fluoranthene
- 3 Washington State Department of Ecology, 1994. Natural Background Soil Metals Concentrations in Washington State, Publication #94-115, October 1994. Statewide average.
- 4: SVOCs were below the MRLs except for some PAH compounds detected in samples: GP06-7.5-080516 & GP07-40-080522. Only PAH detections from the 8270-SIM analysis are reported above.
- 5: DEQ, 2007. Portland Harbor Joint Source Control Strategy (JSCS) Document. Table 3-1 (7/16/07 Revison). Most conservative screening level values (SLVs) for Upland Soil/Stormwater Sediment divided into human health and ecological SLVs were used from DEQ, 2007. Guidance for Assessing Bioaccumulative Chemicals of Concern in Sediment. January 31.

Table A-5 DRAFT

Soil Analytical Results: TPH

SIUF, Operable Unit 4 Portland, Oregon

Sample ID:	OU4-1	OU4-2	OU4-2-2	OU4-3	OU4-4	OU4-5	OU4-6	OU4-7	OU4-8
Sampling Interval (inches):	12 - 30	8 - 32	18 - 22	12 - 34	12 - 34	12 - 22	12 - 38	12 - 20	12 - 25
Sample Date:	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010
NWTPH-HCID (mg/kg)									
Gasoline Range			ND	-					
Diesel Range			DETECTED						
Motor Oil Range		-	DETECTED	-		-			-
NWTPH-Dx (mg/kg)									
Diesel Range SG	<24.5	80.8		<28.1	<23.6	98.9	<25.5	<24.3	<23.7
Motor Oil Range SG	<98.2	166		<112	<94.5	216	<102	<97.2	<94.7

- 1. NWTPH-Dx = Diesel and oil-range total petroleum hydrocarbons (TPH) by Northwest Method NWTPH-Dx (with silica gel cleanup).
- 2. NWTPH-HCID = TPH hydrocarbon identification by Northwest Method NWTPH-HCID.
- 3. mg/kg (ppm) = milligrams per kilogram (parts per million).
- 4. < = Not detected above the method reporting limit (MRL).
- 5. ND = Not detected.
- 6. -- = Not analyzed.

Table A-6 DRAFT

Soil Analytical Results: Metals

SIUF, Operable Unit 4 Portland, Oregon

Sample ID:	OU4-1	OU4-2	OU4-3	OU4-4	OU4-5	OU4-6	OU4-7	OU4-8
Sampling Interval (inches):	12 - 30	8 - 32	12 - 34	12 - 34	12 - 22	12 - 38	12 - 20	12 - 25
Sample Date:	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010
Metals (mg/kg)								
Antimony	<0.65	<0.51	<0.62	<0.56	< 0.50	<0.55	<0.50	<0.53
Arsenic	4	2.5	18.7	3.1	2.2	3.2	3.1	3.2
Cadmium	<0.10	<0.081	<0.099	<0.089	<0.080	<0.087	<0.079	<0.085
Chromium	31.1	20.0	22.7	21.3	16.6	26.7	20.8	21.0
Copper	76.3	25.4	30.1	25.1	21.4	31.6	28.3	27.8
Lead	48.6	5.3	11.1	4.7	4.6	7.3	4.9	5.0
Nickel	43.3	25.9	28.4	26.6	23.9	28.6	26.1	23.1
Silver	< 0.65	<0.51	< 0.62	<0.56	< 0.50	<0.55	< 0.50	< 0.53
Zinc	101	52.4	84.4	63.4	60.7	69.3	61.2	62.9
Mercury	<0.11	0.098J	0.040J	0.094J	0.017J	0.041J	0.031J	<0.11

- 1. Metals by EPA 6000/7000 Series Methods.
- 2. mg/kg (ppm) = milligrams per kilogram (parts per million).
- 3. < = Not detected above the method reporting limit (MRL).
- 4. J = Estimated concentration above the method detection limit and below the MRL.

Table A-7 DRAFT

Soil Analytical Results: PAHs SIUF, Operable Unit 4

Portland, Oregon

Sample ID:	OU4-1	OU4-2	OU4-3	OU4-4	OU4-5	OU4-6	OU4-7	OU4-8
Sampling Interval (inches):	12 - 30	8 - 32	12 - 34	12 - 34	12 - 22	12 - 38	12 - 20	12 - 25
Sample Date:	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010
PAHs (ug/kg)								
1-Methylnaphthalene	<44.8	<43.6	<9.7	<8.6	<39.8	<9.0	<8.8	<8.5
2-Methylnaphthalene	<44.8	45.0	<9.7	<8.6	52.1	<9.0	<8.8	<8.5
Acenaphthene	<44.8	68.1	<9.7	<8.6	<39.8	<9.0	<8.8	<8.5
Acenaphthylene	439	868	<9.7	<8.6	1,150	<9.0	<8.8	<8.5
Anthracene	173	695	<9.7	<8.6	716	<9.0	<8.8	<8.5
Benzo(a)anthracene	1,560	4,030	25.9	14.3	6,500	16	<8.8	<8.5
Benzo(a)pyrene	2,850	7,220	26.8	15.3	10,100	24.6	9.7	<8.5
Benzo(b)fluoranthene	2,540	5,420	15.7	10.4	8,340	14.6	<8.8	<8.5
Benzo(g,h,i)perylene	3,430	7,050	14.6	11.4	11,300	16.6	8.9	<8.5
Benzo(k)fluoranthene	1,550	4,180	17.1	10.4	6,860	14.1	<8.8	<8.5
Chrysene	2,110	5,950	23.0	13.7	8,770	18.9	<8.8	<8.5
Dibenz(a,h)anthracene	<44.8	<43.6	<9.7	<8.6	<39.8	<9.0	<8.8	<8.5
Fluoranthene	4,370	16,200	36.0	26.9	21,700	22.6	12.3	11.2
Fluorene	49	277	<9.7	<8.6	191	<9.0	<8.8	<8.5
Indeno(1,2,3-cd)pyrene	2,310	5,080	11.8	<8.6	8,130	13.3	<8.8	<8.5
Naphthalene	51.2	131	14.6	<8.6	133	9.9	<8.8	<8.5
Phenanthrene	1,490	9,480	15.7	10	9,620	11.1	<8.8	<8.5
Pyrene	7,050	19,800	46.0	30.7	26,600	29.5	22.7	13.7

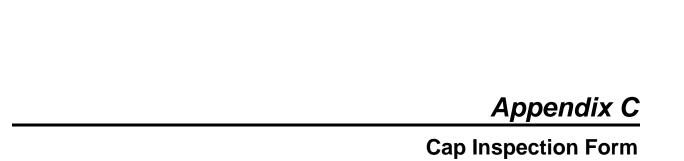
- 1. PAHs = Polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270M-SIM.
- 2. μg/kg (ppb) = Micrograms per kilogram (parts per billion).
- 3. < = Not detected above the method reporting limit (MRL).



WARNING

This parking lot contains contaminants below the asphalt cap in some areas.

Please contact the Environmental Manager for this area at 503-247-1806 prior to any excavations.



Cap Inspection Form Soil Management Plan Swan Island Upland Facility - OU4 Portland, Oregon

Date	Inapactor	Condition of	Actions Needed	Action Completed Date Initials	Notes
Date	Inspector	Pavement Cap	Actions Needed		Notes
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			
		1 2 3 4 5			